



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1445 North Orchard • Boise, Idaho 83706-2239 • (208) 373-0550

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

January 18, 2002

**CERTIFIED MAIL # 7000 1530 0005 5348 4038**

Mr. Gene Hibbard, Plant Supervisor  
Crookham Company  
P.O. Box 520  
Caldwell, Idaho 83606

RE: T2-000035, Crookham Company, Caldwell, Idaho  
Final Tier II Operating Permit No. #027-00020

Dear Mr. Hibbard:

The Idaho Department of Environmental Quality (Department) is issuing Tier II Operating Permit Number 027-00020 for Crookham Company in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II Operating Permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. **This Tier II permit is effective immediately.** Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Mr. Thomas Krinke of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends attendance of your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, the Department encourages you to contact us to discuss any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Mike Simon at (208) 373-0502 or [msimon@deq.state.id.us](mailto:msimon@deq.state.id.us).

Sincerely,

Stephen E. West  
Regional Administrator

SEW:REB:cm G:\BALDWIN\OP\TIER2\CROOKHAM T2 FINAL PERMIT LTR. DOCDOC

Enclosure

cc: ~~Faye Weber~~, Air Quality Division ~~db~~  
Belinda McFarland, Technical Services  
Source File / Reading File  
Laurie Kral, EPA Region 10



**Air Pollution  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 027-00020

AQCR: 64

CLASS: SM

SIC: 721 0123

ZONE: 11

UTM COORDINATE (km): 524 .107, 4835 .085

1. **PERMITTEE**  
Crookham Company

2. **PROJECT**  
Tier II Operating Permit – Northern Ada County PM<sub>10</sub> Maintenance Plan

3. **MAILING ADDRESS**  
P.O. Box 520

**CITY**  
Caldwell

**STATE**  
Idaho

**ZIP**  
83606

4. **FACILITY CONTACT**  
Gene Hibbard

**TITLE**  
Plant Supervisor

**TELEPHONE**  
(208) 459-7451

5. **RESPONSIBLE OFFICIAL**  
Gene Hibbard

**TITLE**  
Plant Supervisor

**TELEPHONE**  
(208) 459-7451

6. **EXACT PLANT LOCATION**  
301 West Warehouse, Caldwell

**COUNTY**  
Canyon

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Corn, onion seed, and carrot seed processing

8. **PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants that are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions, may be a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

  
ADMINISTRATOR, BOISE REGIONAL OFFICE  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: January 18, 2002

DATE EXPIRES: January 18, 2007

REB MASP.TVMB.4005.480

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027- 00020**

Permittee: Crookham Company  
Location: Caldwell, Idaho

Date Issued: January 18, 2002  
Date Expires: January 18, 2007

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**SOURCE: Receiving, Husking, Drying, Shelling, Scalping, Sizing, Electronically Identifying, Bagging, and Vehicle Traffic**

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**1. EMISSION LIMITS**

**1.1 Emission Limits**

Particulate matter (PM), and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM<sub>10</sub>) emissions from the stacks associated with the processes of receiving, husking, drying, shelling, sizing, electronically identifying, and bagging corn, onion, and carrot seeds, as well as vehicle operation shall not exceed the pounds per hour and the tons per any consecutive 12-month period limits listed in the Appendix of this permit.

**1.2 Opacity Limit**

Emissions from the stacks associated with the processes of receiving, husking, drying, shelling, sizing, electronically identifying, and bagging of corn, onion and carrot seeds, as well as vehicle, or any other stack, vent, or functionally equivalent opening, shall not exceed 20 percent opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined by the procedure contained in IDAPA 58.01.01.625.

**1.3 Visible Emission Limits**

Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by Environmental Protection Agency Reference Method 22, as described in 40 CFR 60, the Appendix, or a Department-approved alternative method.

**2. OPERATING REQUIREMENTS**

**2.1 Operating Hours**

In each process, the receiving, husking, drying, shelling, sizing, electronically identifying, and bagging shall not exceed 1,210 hours of operation per any consecutive 12-month period.

**2.2 Process Requirements**

The receiving, husking, drying, shelling, sizing, electronically identifying, bagging processes, and vehicle traffic fugitive dust control shall be maintained as stated within the manufacturer's specifications or associated operation and maintenance manual. Documentation of maintenance or operation changes for any process or traffic fugitive dust operations shall remain onsite at all times and made available to Department representatives upon request.

**2.3 Material Throughput**

The permittee shall not exceed the receiving limit of 14,000 tons of material for processing per any consecutive 12-month period.

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**2.4 Reasonable Control of Fugitive Emissions**

As required in IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent PM from becoming airborne. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM.

Some of the reasonable precautions include, but are not limited to, the following:

- 2.4.1 Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing of lands;
- 2.4.2 Applying asphalt, water or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust;
- 2.4.3 Installing and using hoods, fans and fabric filters, or equivalent systems to enclose and vent the dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- 2.4.4 Covering open-bodied trucks transporting materials likely to give rise to airborne dusts;
- 2.4.5 Paving of roadways and maintaining them in a clean condition; or
- 2.4.6 Promptly removing earth or other stored material from streets.

**3. MONITORING AND RECORDKEEPING REQUIREMENTS**

**3.1 Monitor Operation Parameters**

The most recent five-year compilation of records shall be kept onsite, in a record, and shall be made available to Department representatives upon request. The permittee shall monitor and record, on a weekly basis, the information listed below.

- 3.1.1 Any visible emissions from any stack associated with a process on a weekly basis
- 3.1.2 Hours of operation each year

**3.2 Material Received**

The permittee shall maintain a record of the material received for processing during any consecutive 12-month period.

**3.3 Operations and Maintenance (O&M) Manual Requirements**

Within 60 days after permit issuance, the permittee shall have developed an O&M manual for each process air pollution control device (cyclone and baghouse). The O&M manual shall describe the procedures followed to comply with General Provision B of this permit and the manufacturer's air pollution control device specifications. This manual shall remain onsite at all times and be made available to Department representatives upon request.

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**4. REPORTING REQUIREMENTS**

**4.1 Certification of Documents**

All documents submitted to the Department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

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**Appendix**

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**Appendix**

**Crookham Company**

**Hourly (lb/hr)<sup>a</sup> and Annual<sup>b</sup> (T/yr) <sup>c</sup>Point Source Emissions Limits<sup>d</sup>**

| <b>SOURCE</b>   | <b>PM<sub>10</sub><sup>e</sup></b> |             |
|---|------------------------------------|-------------|
|   | <b>lb/hr</b>                       | <b>T/yr</b> |
| Combined Cyclones and Baghouses                             | 0.43                               | 0.26        |
| Associated Uncontrolled Stack and Vehicle Traffic Emissions | 9.79                               | 5.92        |

<sup>a</sup> Pound per hour

<sup>b</sup> As determined by multiplying the actual or allowable (if actual is not available) lb/hr emission rate by the allowable hours per year that the process(es) may operate, or by actual annual production rates.

<sup>c</sup> Tons per year

<sup>d</sup> As determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or as determined by the Department emission estimation methods used in the permit application analysis.

<sup>e</sup> PM<sub>10</sub> - particulate matter with an aerodynamic diameter of 10 microns or less.

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**GENERAL PROVISIONS**

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**TIER II OPERATING PERMIT GENERAL PROVISIONS**

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.
- B. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
1. To enter upon the permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  2. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state-approved or accepted Environmental Protection Agency procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department.
- E. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the permittee to develop a list of O&M procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

The permittee shall submit a proposed test date for **each** performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five working days advanced notice prior to conducting any re-scheduled test, unless the Department approves a shorter notice period.

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Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120 percent of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emission limit unless (1) a more restrictive operating limit is specified elsewhere in this permit, or (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.